

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

_____	)	
CENTRAL MUTUAL INSURANCE COMPANY,	)	
Plaintiff	)	
	)	
v.	)	Case No. 1:22-cv-00192-SE
	)	
SOCLEAN, INC,	)	
Defendant	)	
_____	)	

**ASSENTED-TO MOTION TO STAY PROCEEDINGS**

Plaintiff, Central Mutual Insurance Company (“Central”) requests that this Court enter a stay of all proceedings in this action. As reasons therefor, Central states the following:

1. This action seeks a declaration regarding coverage under various liability insurance policies issued by Central to SoClean, Inc., for claims made against it in Civil Action No. 1:21-cv-1029 in the United States District Court for the District of New Hampshire (“the Underlying Action”).
2. The Underlying Action has been consolidated with several other similar actions in Civil Action No. 2:22-mc-00152 in the United States District Court for the Western District of Pennsylvania. (“the Consolidated Action”)
3. SoClean, Inc. has filed a Motion to Dismiss all claims against it in the Consolidated Action. Should such Motion be successful, the dispute that is the basis of the current declaratory judgment action will be moot.
4. A stay of the current proceedings until such time as SoClean’s Motion to Dismiss the Consolidation Action has been ruled upon by the federal court, would be in the interests of judicial efficiency.
5. The parties will notify this Court of any such ruling and will submit a proposed schedule for further proceedings at that time.

6. Counsel for SoClean has assented to the proposed stay of proceedings.
7. No party will be prejudiced by this Court's allowance of the Motion to Stay.

WHEREFORE, Central requests that this Court enter a stay of all proceedings—including any obligation of SoClean to respond to the Complaint-- until such time as the pending Motion to Dismiss in Civil Action No. 2:22-mc-00152 has been ruled on by the federal court.

THE PLAINTIFF,  
CENTRAL MUTUAL INSURANCE  
COMPANY  
BY ITS ATTORNEY,

/s/ Peter L. Bosse

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